

## **Exhibit 65**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

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COALITION FOR TJ, :  
Plaintiff, :  
v. : Civil Action No.:  
FAIRFAX COUNTY SCHOOL : 1:21-cv-00296-CMH-JFA  
BOARD, :  
Defendant. :

-----x  
Deposition of Coalition for TJ  
By and through its Designee  
GLENN MILLER  
McLean, Virginia  
Monday, October 18, 2021  
2:18 p.m.

Job No.: 404859  
Pages: 1 - 137  
Reported by: Judith E. Bellinger, RPR, CRR

1 A Yes.

2 Q And I think you also mentioned Cooper  
3 Middle School.

4 A I meant Kilmer. It was Kilmer, not  
5 Cooper. Kilmer and Longfellow were combined  
6 together, not Cooper and Longfellow. It was  
7 Kilmer and -- Cooper and Kilmer.

8 Q Okay. Thank you.

9 A Yeah.

10 Q Then I would like to ask you some  
11 questions about the second-look semifinalist  
12 proposal that we spent a lot of time on today.

13 A Yeah.

14 Q The second-look proposal, is it fair to  
15 characterize that as a response to the proposed  
16 merit lottery?

17 A That -- yeah. It's a response to the  
18 merit lottery. It is not something -- it is not  
19 our optimal solution, but it is in response to, at  
20 the time, to a system that was, you know, bad and  
21 we were trying to come up with a compromise based  
22 on the current situation. But it's not -- it's

1 not, you know, it's not necessarily the most  
2 optimal system.

3 Q So it was the only formal proposal that  
4 was written up and given to the board, but was it  
5 intended to be the coalition's position on how  
6 TJ's admissions should be done?

7 MS. REWARI: Objection. Leading.

8 A It was a -- it was a compromised  
9 proposal to deal with the current situation. It  
10 was not our optimal position. Our optimal  
11 position was some variation of what was originally  
12 in place, with the standardized test.

13 Q And so does the coalition believe that  
14 the second-look proposal was preferable to keeping  
15 the preexisting admission system?

16 A No.

17 Q Is it the coalition's responsibility to  
18 come up with an admissions system for TJ?

19 MS. REWARI: Objection. Calls for a  
20 legal conclusion.

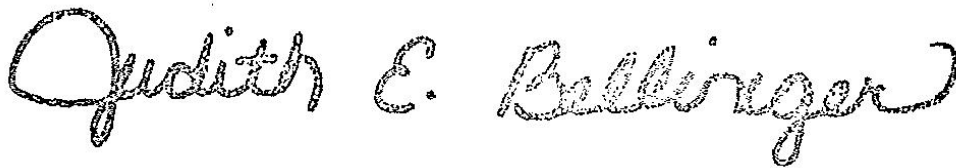
21 A No. It's -- that's up to the county  
22 and it's up to the judge.

CERTIFICATE OF REPORTER - NOTARY PUBLIC

I, JUDITH E. BELLINGER, RPR, CRR, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me and thereafter reduced to typewriting under my direction; that reading and signing was not requested; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 5th day of November, 2021.

My Commission Expires: September 30, 2024

A handwritten signature in cursive script that reads "Judith E. Bellinger". The signature is written in dark ink and is positioned above the notary public text.

NOTARY PUBLIC IN AND FOR  
THE COMMONWEALTH OF VIRGINIA